



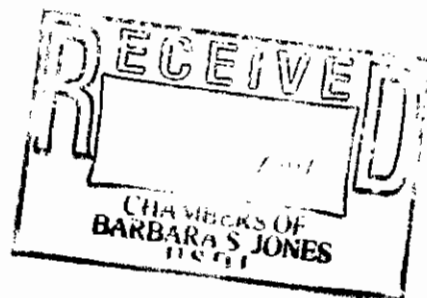
United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

September 12, 2007

By Hand

The Honorable Barbara S. Jones
United States District Judge
United States Courthouse
500 Pearl Street, Room 620
New York, NY 10007



Re: United States v. Annucci and Proscia
S1 06 Cr. 982 (BSJ)

Dear Judge Jones:

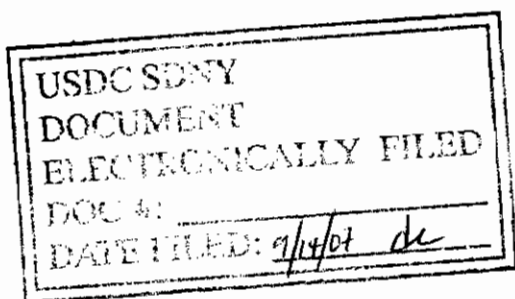
The Government respectfully submits this letter to inform the Court of the status of the case with regard to defendant Frank Proscia, and to request additional time to respond to Proscia's motions.

The Government and counsel for Proscia have been engaged in extensive plea negotiations; the parties anticipate a resolution to this matter within the next two weeks. Consistent with the schedule set by the Court, Proscia filed defense motions, and the Government's responses are due September 17, 2007. In light of the fact that the Government anticipates that Proscia will enter a guilty plea, thus obviating the need for the Government to respond to Proscia's motions, the Government, with Proscia's consent, respectfully requests an extension of time to respond to the motions, from September 17 to September 24, 2007. In addition, the parties request that the date for a conference before the Court be similarly extended to on or around October 4, 2007, or as soon thereafter is convenient to the Court.

Respectfully submitted,

MICHAEL J. GARCIA
United States Attorney

By: Katherine Goldstein/Lisa Zornberg
Katherine Goldstein/Lisa Zornberg
Assistant United States Attorneys
(212) 637-2720/ 2641



cc: Charles Ross, Esq. (By facsimile)
Joseph DeMatteo, Esq. (By facsimile)

Application Granted.
Argument Rescheduled for Oct 5, 10 AM
Barbara S. Jones
SO ORDERED
Dated: Barbara S. Jones
BARBARA S. JONES
U.S.D.J.